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Zydus Pharmaceuticals USA, Inc. and
Cadila Healthcare, Limited

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TAKEDA PHARMACEUTICAL
COMPANY LIMITED, TAKEDA
PHARMACEUTICALS NORTH
AMERICA, INC., TAKEDA
PHARMACEUTICALS LLC,
TAKEDA PHARMACEUTICALS
AMERICA, INC., and ETHYPHARM,
S.A.,

Plaintiffs,

v.

ZYDUS PHARMACEUTICALS USA
INC. and CADILA HEALTHCARE
LIMITED,

Defendants.

CIVIL ACTION NO:
3:10-CV-01723-JAP-TJB

Returnable: July 2, 2012

Oral Argument Requested

**NOTICE OF MOTION ON
CONSENT TO SEAL
MAY 10, 2012 MEMORANDUM
OPINION AND TO FILE
REDACTED COPY ON THE
PUBLIC DOCKET**

To: Attached Service List

PLEASE TAKE NOTICE that on July 2, 2012, at 9:00 a.m., or as soon
thereafter as counsel may be heard, counsel for defendants Zydus Pharmaceuticals,
USA, Inc. and Cadila Healthcare, Limited (collectively “Zydus”), shall move,

through its attorneys Kelley Drye & Warren LLP and with the consent of counsel for Plaintiffs, before the Hon. Tonianne J. Bongiovanni, for an Order sealing the Court's May 10, 2012 Memorandum Opinion denying Plaintiffs Motion for Spoliation Sanctions, and further granting Zydus leave to file a redacted copy of the Memorandum Opinion, in the form attached hereto as Exhibit A, on the public docket.

PLEASE FURTHER TAKE NOTICE that in support of this motion, Zydus shall rely upon Defendants' Memorandum In Support Of Defendants' Motion for an Order Sealing Memorandum Opinion.

PLEASE FURTHER TAKE NOTICE that a proposed form of Order is submitted herewith in accordance with L. Civ. R. 7.1(e).

Dated: June 8, 2012

KELLEY DRYE & WARREN LLP

By: /s/ Vincent P. Rao

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Attorneys for Defendants

Zydus Pharmaceuticals USA, Inc. and

Cadila Healthcare Limited

CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2012 I caused to be served a copy of the foregoing Defendants Zydus Pharmaceuticals, USA, Inc. and Cadila Healthcare's Notice of Motion On Consent to Seal May 10, 2012 Memorandum Opinion and to File Redacted Copy on the Public Docket together with the Memorandum of Law and a Proposed Order on each interested party in this action in accordance with the electronic filing procedures of the United States District Court for the District of New Jersey and via ECF on the following.

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Dated: June 8, 2012

s/Vincent P. Rao II

Vincent P. Rao II